

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT**

**In the Matter of:**

JOSEPH G. DUMOUCHELLE, and  
MELINDA J. ADDUCCI,  
*Debtors.*

Bank. Case No. 19-54531-lsg  
Chapter 7  
Hon. Lisa S. Gretchko

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THOMAS T. RITTER,  
*Plaintiff,*  
  
v.  
~~JOSEPH G. DUMOUCHELLE, and~~  
MELINDA J. ADDUCI,  
*Defendants.*

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Adv. Pro. No. 20-04381-lsg  
Hon. Lisa S. Gretchko

**DEFENDANT’S CORRECTION TO RESPONSE  
TO PLAINTIFF’S DISCOVERY REQUESTS**

**NOW COME** the Defendant, Melinda Adduci ( “Melinda”), by and through her counsel, JOHN R. FOLEY, P.C., who hereby submits the following correction to her January 6, 2023 *Response to Discovery* (ECF No. 68):

The response to Interrogatory No. 4, located on Page 4, Paragraph 4, Sub-Paragraph “b”, should include the word “not” after the words “I did” and before the word “negotiate” at the start of the first sentence of the first paragraph of Melinda’s response.

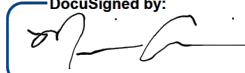
Therefore, the first paragraph of Melinda’s response to Interrogatory No. 4 should read as follows:

b. **Melinda Response:** I did not negotiate or have knowledge of the reasons or details of any of the transfers

made. Joe negotiated/calculated/ effectuated any transfers. My only involvement was one day, while I was already in Tuscon, Arizona, for the AGA Gem Conference (Attachments 8 & 9) and Joe had missed the closing of the banks in Michigan, and the banks in Arizona were still open due to the time zone difference, Joe emailed the bank and setup the counter-checks/transfers (Attachments 1, 2, & 3) and called me and asked that I go to the bank and sign for them. (Attachments 4, 5, & 6). Joe simply asked me to go to the bank and sign if needed, as the only other signer on the account. Again, I had no knowledge of what these transfers were for, why they were being made, etc. And none of that money came to me.

### **VERIFICATION**

By signing below, I swear and affirm that the foregoing responses to discovery are true and accurate to the best of my knowledge, information, and belief.

DocuSigned by:  


863CED7389DE460...  
 Melinda ADDUCCI

*as to her correct answers/response only.*

11/9/2023

Date

Respectfully Submitted,  
**JOHN R. FOLEY, P.C.**  
*Counsel for Defendant*

Dated: November 9, 2023

By: /s/ Patrick A. Foley  
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**PROOF OF SERVICE**

Patrick A. Foley hereby certifies that on November 9, 2023 he did serve a copy of the foregoing CORRECTED discovery response, upon counsel for the Plaintiff, THOMAS R. RITTER by emailing a copy of the same, via the Court's CM/ECF e-Filing System to:

- Kimberly Ross Clayson      kclayson@taftlaw.com, ttorni@taftlaw.com
- Jay L. Welford              jwelford@taftlaw.com, ttorni@taftlaw.com

Respectfully Submitted,  
**JOHN R. FOLEY, P.C.**  
*Counsel for Defendant*

Dated: November 9, 2023

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